

1. On August 2, 2021, Plaintiff Thomas J. Alston (“Plaintiff”) filed a Complaint against LNRS and SageStream, LLC (“SageStream”) in the Superior Court of the District of Columbia, entitled *Thomas J. Alston v. LexisNexis Risk Solutions Inc., et al.*, Case No. 2021 CA

002667B. Pursuant to 28 U.S.C. § 1446(a), all process, pleadings, notices, and orders served upon LNRS in this action are attached as **Exhibit A**.

2. The Summons and Complaint in the Civil Action were served on LNRS on or about August 12, 2021. Therefore, this Notice of Removal is filed within the time prescribed by 28 U.S.C. § 1446(b)(1). *Murphy Bros., Inc. v. Michetti Pipe Stringing, Inc.*, 526 U.S. 344, 354–56 (1999) (30-day deadline to remove commences upon service of the summons and complaint).

3. Upon information and belief, Plaintiff has not properly served a copy of the Complaint on SageStream. Thus, all Defendants to the claims over which this Court has original jurisdiction under 28 U.S.C. § 1331 have joined in or consented to removal of the Civil Action.

4. Plaintiff's Complaint involves claims arising under the Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.* His first claim is brought under Section 1681g of the FCRA. (Compl., ¶ 17.) His second claim is brought under Section 1681s-2 of the FCRA. (*Id.* at ¶ 25.) Thus, the Civil Action is one over which this Court has original jurisdiction under 28 U.S.C. § 1331, and which is removable by LNRS under the provisions of 28 U.S.C. § 1441 in that the matter arises under this Court's original jurisdiction and is founded on a claim or right arising under the Constitution, treaties or laws of the United States and is removable without regard to citizenship or residence of the parties under 28 U.S.C. § 1441.

5. Federal question jurisdiction exists over this action because the allegations asserted by Plaintiff in the Complaint involve questions that will require resolution of significant, disputed issues arising under federal law. This case qualifies for federal question jurisdiction and is removable because Plaintiff's Complaint alleges claims under, and requires a ruling on, the FCRA.

6. No proceedings have occurred in the Civil Action as of the date of this Notice of Removal. Neither LNRS nor SageStream has filed a response to the Complaint. LNRS hereby

reserves any and all rights to assert any and all defenses and/or objections to the Complaint. LNRS further reserves the right to amend or supplement this Notice of Removal.

7. Venue lies in the U.S. District Court for the District of Columbia pursuant to 28 U.S.C. § 118(a), § 1391, § 1441(a), and § 1446(a). This action was originally brought in the Superior Court of the District of Columbia, and thus should be removed to the U.S. District Court for the District of Columbia.

8. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal is being served this day upon Plaintiff and filed with the Clerk of the Superior Court of the District of Columbia. A copy of the notice to the state court clerk, without exhibits, is attached hereto as **Exhibit B**.

9. By filing this Notice of Removal, LNRS does not concede nor waive any defense or motion relating to this action. LNRS reserves all defenses.

10. In addition to satisfying the requirements of federal question jurisdiction, LNRS has met all other requirements for removal.

For the reasons stated above, this Civil Action is properly removed to this District Court.

Dated: September 1, 2021

Respectfully submitted,

LEXISNEXIS RISK SOLUTIONS INC.

/s/ S. Mohsin Reza

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*Attorney for Defendant LexisNexis Risk Solutions
Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of September 2021, the foregoing was served via first class mail and electronic mail on the following:

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Pro se

s/ S. Mohsin Reza
Syed Mohsin Reza